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FCC MAIL ROOM

November 2, 1995

Secretary
Federal Communications Commission
1919 M Street, N.W.
Washington, D.C. 20554
Attn: Allocations Branch

DOCKET FILE COPY ORIGINAL

RE: Petition for Rulemaking To Amend FM
Table of Allotments, Sibley, IA and Brandon, SD

To Whom It May Concern:

Please find enclosed an original and four copies of the above referenced Petition for Rule Making to substitute Channel 261C3 for Channel 262A at Sibley, Iowa and the reallocation of Channel 261C3 from Sibley, Iowa to Brandon, South Dakota and the modification of the construction permit of FM Station KAJQ (BPH-930809MA) accordingly.

Also enclosed is a file stamped copy. Please stamp and return the copy marked Stamp and Return in the attached postage paid return envelope.

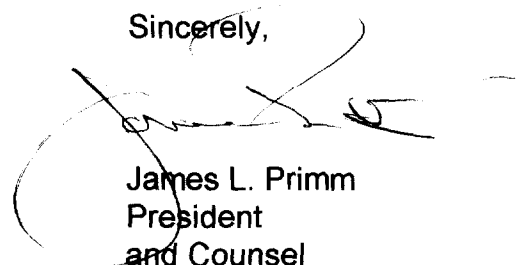
21st Century hereby requests expedited consideration of the attached Petition. 21st Century wishes to change its city of license for its construction permit currently for operation on Channel 262A Sibley, IA to Channel 261C3 at Brandon, SD pursuant to Section 1.420(i) of the Commission's rules. Petitioner's construction permit for Channel 262A at Sibley, IA will expire on May 4, 1996 and 21st Century therefore requests expedited consideration of the instant Petition so that it will have time to construct its facility at Brandon prior

024

to expiration of its construction permit, provided the Commission grants this Petition.

Please contact the undersigned if you have any questions.

Sincerely,

A handwritten signature in black ink, appearing to read "James L. Primm", is written over the typed name and title. The signature is stylized with a large, sweeping initial "J" and a long horizontal stroke.

James L. Primm
President
and Counsel

**Before the
FEDERAL COMMUNICATIONS COMMISSION
Washington, D.C. 20554**

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In the matter of)
)
Amendment of Section 73.202(b)) MM Docket No.
) RM-
Table of Allotments)
FM Broadcast Stations)
Sibley, IA and Brandon, SD)
To: Chief, Policy and Rules Division

PETITION FOR RULE MAKING

21st Century Radio Ventures, Inc., permittee of KAJQ (FM), Sibley, IA ("Petitioner") (File No. BPH-930809MA) hereby petitions the Commission to institute a rule making proceeding for the purpose of substituting Channel 261C3 for Channel 262A at Sibley, IA and the reallocation of Channel 261C3 from Sibley to Brandon, South Dakota to provide that community with its first local service. Petitioner proposes to amend the Table of FM Allotments as follows:

	<u>Present</u>	<u>Proposed</u>
Sibley, IA	262A	-----
Brandon, SD	-----	261C3

The coordinates for the proposed allotment to Brandon, SD are North Latitude 43°36'02" and West Longitude 96°31',15". Note that Channel 282A is available as an

equivalent substitution for Channel 262A at Sibley, IA.

In addition, it is requested that the Commission modify the construction permit issued to Petitioner for KAJQ(FM) to specify operation on Channel 261C3 at Brandon, South Dakota, pursuant to Section 1.420(i) of the Commission's Rules. The Commission may modify the permit issued to Petitioner without considering competing expressions of interest because the proposed allotment of Channel 261C3 to Brandon, South Dakota is mutually exclusive with the present allotment of Channel 262A at Sibley, IA. As discussed below, the proposed change in allotments will not deprive Sibley of a service upon which the public has come to rely because Petitioner has not yet constructed KAJQ and the proposed change in allotments will result in a preferred distribution of facilities under the Commission's FM allotment priorities and policies. See Amendment of the Commission's Rules Regarding Modification of FM and TV Authorizations to Specify a New Community of License, 4 FCC Rcd 4870, 66 RR 2d 827 (1989) ("Report and Order"), recon. granted in part, 5 FCC Rcd 7094, 68 RR 2d 644 (1990) ("Memorandum Opinion and Order").

DISCUSSION

I. BRANDON IS CLEARLY A COMMUNITY FOR PURPOSES OF THE COMMISSION'S ALLOTMENT CRITERIA AND IS SEPARATE AND APART FROM THE COMMUNITY OF SIOUX FALLS, SOUTH DAKOTA

47 U.S.C. Section 307(b), as amended, requires that the Commission distribute frequencies among the "several states and communities." The Commission has defined community as a geographically identifiable population grouping. Generally, if a community is incorporated or is listed in the U.S. Census, that is sufficient to satisfy its status as a community. See Revision of FM Assignments Policies and Procedures, 90 F.C.C. 2d 88 (1982) ("Assignments Policies"). Brandon, SD (population 3,543) is identified as a separate community in the 1990 U.S. Census.

Brandon is a community separate and apart from the community of Sioux Falls, South Dakota. Brandon was incorporated in 1973 and is governed independently (mayor and six council members) and holds elections for its own officials. Brandon operates its own police department. It also has a separate tax base, requiring payment of certain property taxes and a separate city sales tax of 2%. Brandon also maintains its own school system and has its own 26 member volunteer fire department. In addition, Brandon is not located within an urbanized area.

II. ALLOTMENT OF CHANNEL 261C3 AT BRANDON, SD IS MUTUALLY EXCLUSIVE WITH AN ALLOTMENT OF CHANNEL 262A AT SIBLEY, IA

Section 1.420(i) of the Commission's rules permits a station to specify a new community of license, provided the proposed allotment is mutually exclusive with the present assignment. Because the Brandon Channel 261C3 reference site would be short-spaced to the authorized KAJQ site, the new allotment is mutually exclusive with the existing allotment. Please see Figure 1 of the engineering statement of duTreil, Lundin & Rackley attached hereto for an allocation study of the cities in question.

The referenced site at Brandon also complies with the Commission's minimum distance separation requirements contained in Section 73.207 to all existing, authorized and proposed stations and allotments, except to the authorized KAJQ site. Operation from the reference site will provide the requisite city grade signal to all of Brandon. Figure 2 of the Engineering Exhibit attached hereto is a map showing the area to locate channel 261C3 at Brandon in compliance with the Commission's minimum distance separation requirements and city coverage requirements based on maximum Class C3 facilities.

III. THE PROPOSAL WILL RESULT IN A PREFERENTIAL ARRANGEMENT OF ALLOTMENTS

A. Brandon, SD Will Receive Its First Local Broadcast Service Without The Loss of an Existing Service to Sibley, IA

Application of the Commission's FM allotment priorities and policies to the

proposed change of allotments will result in a preferential arrangement of allotments. Brandon will be provided with its first local broadcast service which is the Commission's third FM allotment priority and second in weight behind provision of a first aural service. See Assignment Policies, 90 F.C.C. 2d 88, 92 (1982). The removal of KAJQ from Sibley, on the other hand, will not deprive that community of a local transmission service on which it has come to rely because KAJQ has never been constructed and is therefore not a service upon which the public has come to rely.

Figure 6 of the attached engineering statement of duTreil, Lundin & Rackley indicates that Brandon will remain "well served" by aural services even in the absence of KAJQ (which is not yet on the air in any event). As demonstrated in the attached Engineering Exhibit, all of the gain and loss areas will have at least five reception services available after giving effect to the change in community proposal. The Commission has indicated that a community is "well served" by aural service if there are more than five aural services available. See Report and Order, Amendment of Section 73.202(b) (Oshkosh, Winneconne & Townsend, Wisconsin and Menominee, Michigan), MM Docket No. 90-139, released February 21, 1995.

The Commission has viewed reallocations which do not result in the loss of an on-air service more favorably. In the Memorandum Opinion and Order, the Commission noted that a reallocation must not deprive a community of an "existing service." The Commission has indicated that an "existing service" for purposes of

Section 1.420(i) does not include an unbuilt construction permit. The Commission recently upheld reallocation of an unbuilt construction permit noting that although the community being left behind did not yet have a constructed radio service, because no on-air service would be eliminated, the public would not be losing a service upon which it had come to rely. In the Matter of Amendment of Section 73.202(b), Sanibel and San Carlos Park, FL, Report and Order, MM Docket No. 92-10, (released June 29, 1995); Pawley's Island and Atlantic Beach, South Carolina, 8 FCC Rcd 8657 (1993) and; Glencoe and Le Sueur, Minnesota, 7 FCC Rcd 7651 (1992). KAJQ remains unbuilt and therefore there will not be a loss of existing service to Sibley.

B. Alternate FM Channel Is Available at Sibley

Channel 282A is available as an equivalent substitute for Channel 262A at Sibley. As demonstrated in the attached Engineering Exhibit, the Sibley reference site complies with the Commission's minimum distance separation requirements to all known existing, authorized and proposed stations and allotments. As a result, Sibley, IA will not be deprived of its own FM service in the future should there be an expression of interest.

**C. The Number of Persons Served Will Be Dramatically Increased From
23,527 People to 151,891 People With A "Net Increase" in 1mV/m
Coverage of 128,364 People.**

The attached Engineering Exhibit of duTreil, Lundin & Rackley indicates that the reallocation will result in a dramatic increase in service to populated areas, with service increasing from only 23,527 people to 151,891 people. This results in a net gain of 128,364 persons served, even after allowing for a theoretical loss in service to 23,527 people (the loss is noted as theoretical because the station is unbuilt and has never been on the air). The theoretical loss in service will be reduced to only 5,475 people should Channel 282A be allocated to Sibley, with a net gain of 156,090.

Petitioner suggests that the resulting large increase in population served justifies a small theoretical loss in service from unbuilt KAJQ, particularly because the loss occurs in areas already well served by radio (defined as five or more services reaching the area).

It should also be noted that Brandon (population 3,543) is itself a larger community than Sibley (population 2,815). As a result, Petitioner's request will bring first local service to more people.

D. KAJQ Was Not Obtained Through the Commission's Comparative Hearing Process

The Memorandum Opinion and Order indicates that a modification of city of license of an unbuilt facility will generally not be permitted when a construction permit is obtained through the Commission's comparative hearing process. Memorandum Opinion and Order, 5 FCC Rcd at 7097. KAJQ was obtained on a first-come first-serve

basis and as a result it is not subject to the foregoing restriction.

V. APPLICATION BY PETITIONER AFTER GRANT OF INSTANT PETITION

In the event that the instant petition is granted, Petitioner will file an application for a modification of its construction permit for the facilities provided herein and shall promptly construct the facilities when such authorization is granted.

VI. SUMMARY AND CONCLUSION

The proposed substitution of Channel 261C3 for Channel 262A at Sibley, Iowa and the reallocation of Channel 261C3 from Sibley to Brandon, South Dakota and the modification of the construction permit of FM station KAJQ accordingly, will result in a preferential arrangement of allotments under the Commission's rules. At least 128,364 more people will be served and the larger city of Brandon, South Dakota (population 3,543 compared to 2,815 at Sibley, Iowa) will be provided with its first local broadcast service. Sibley will not lose a service upon which it had come to rely because KAJQ is not yet on the air. Additionally, an additional FM channel, 282A is available as an equivalent substitution for Channel 262A at Sibley.⁴

The proposed reallocation meets all Commission technical requirements, as the proposed reallocation is mutually exclusive with the present assignment and it will meet

all Commission separation requirements. Operation from the reference site will place a city grade signal over Brandon.

The Statements in this Petition for Rulemaking are true, complete and correct to the best of my knowledge and belief, and are made in good faith.

Respectfully submitted,

21st Century Radio Ventures, Inc.

By: 

James L. Primm
President

21st Century Radio Ventures, Inc.
530 Wilshire Blvd., suite 301
Santa Monica, CA 90401
310-393-2741

DATED 11/2/95

TECHNICAL EXHIBIT
IN SUPPORT OF
A PETITION FOR RULE MAKING
TO AMEND THE FM TABLE OF ALLOTMENTS
SIBLEY, IOWA AND BRANDON, SOUTH DAKOTA

Technical Narrative

This technical narrative and associated exhibits have been prepared on behalf of 21st Century Radio Ventures, Inc. (herein "Petitioner") in support of a Petition for Rule Making to amend Section 73.202(b) by the substitution of channel 261C3 for channel 262A at Sibley, Iowa and the reallocation of channel 261C3 from Sibley to Brandon, South Dakota and the modification of the construction permit (BPH-930809MA) of FM Station KAJQ accordingly. As the requested change to is mutually exclusive with the allotment of channel 262A at Sibley, Petitioner invokes the provisions of Section 1.420(i).

The following is a summary of the reallocation proposal:

- The larger community of Brandon (population 3,543) will be provided with its first local aural transmission service and Sibley (population 2,815) will not be deprived of its sole "existing" local service because petitioner has not yet constructed KAJQ.
- The population of Brandon has increased by 36.8 percent between 1980 and 1990, whereas the population of Sibley has decreased by 7.7 percent during the same time period.
- Brandon is not located within an Urbanized Area as defined by the 1990 U.S. Census.

- The number of persons within the KAJQ 1 mV/m contour will increase from 23,527 persons to 151,891 persons, and there will be a "net" increase in 1 mV/m coverage of 128,364 persons.
- As KAJQ is unbuilt, the loss area created by the proposal is not a service upon which the public has come to rely.
- All population affected by the change in community will remain well served with at least five reception services available.
- Channel 282A is available as an equivalent substitution for channel 262A at Sibley.
- The Petitioner filed a "first-come/first serve" application for the vacant channel 262A allotment at Sibley; therefore, the authorized KAJQ facilities did not result from a comparative hearing.

Proposed Change in Table of Allotments

Station KAJQ is currently authorized by outstanding construction permit (BPH-930809MA) to operate on channel 262A at Sibley, Iowa with an effective radiated power (ERP) of 6 kW and an antenna height above average terrain (HAAT) of 72 meters. The KAJQ application for construction permit was filed on a "first-come/first serve" basis for the vacant channel 262A allotment at Sibley. Therefore, the authorized KAJQ facilities did not result from a comparative hearing.

Sibley, Iowa has a 1990 U.S. Census population of 2,815 persons which represents a 7.7 percent decline from its 1980 U.S. Census population of 3,051. Sibley has

Sibley, Iowa and Brandon, South Dakota

no existing local AM or FM service. As Petitioner has not yet constructed KAJQ adoption of the proposal will not deprive Sibley of its sole "existing" local service because. Furthermore, channel 282A is available as an equivalent substitution for channel 262A at Sibley.

Brandon, South Dakota has a 1990 U.S. Census population of 3,543 persons which represents a 36.8 percent increase in its 1980 U.S. Census population of 2,589 persons. Brandon has no local FM or AM service and, therefore, Petitioner's proposal would bring first local broadcast service to Brandon.

<u>City</u>	<u>Present</u>	<u>Proposed</u>
Sibley, Iowa	262A	-- ¹
Brandon, South Dakota	--	261C3

Compliance With FCC Rules

The attached Figure 1 is a tabulation of required separations pertinent to use of channel 261C3 at Brandon.² The reference site complies with the Commission's minimum distance separation requirements contained in section 73.207 to all existing, authorized and proposed stations and allotments, except to the

¹ Channel 282A is available as an equivalent substitution for channel 262A at Sibley.

² The geographic coordinates for Channel 261C3 at Brandon are North Latitude 43°36'02" and West Longitude 96°31'15".

authorized KAJQ site. Operation from the reference site will provide the requisite city grade signal to all of Brandon.

Figure 2 is a map showing the area to locate channel 261C3 at Brandon in compliance with the Commission's minimum distance separation requirements and city coverage requirements based on maximum Class C3 facilities (ERP 25 kW/HAAT 100 m). The Brandon city limits shown on Figure 2 were obtained from a map contained in the 1990 U.S. Census of Population.

Pursuant to section 1.420(i), the Commission will consider petitions to modify the license of an FM station to specify a new community if the proposed allotment would be mutually exclusive with the present assignment. As the entire area to locate for channel 261C3 at Brandon depicted on Figure 2 would be short-spaced to the authorized KAJQ site, including the channel 261C3 reference site, the new allotment is mutually exclusive with the existing allotment.

Channel 282A is available as an equivalent substitute for channel 262A at Sibley. Figure 3 is a tabulation of separations pertinent to the use of channel 282A at Sibley.³ As demonstrated, the Sibley reference site complies with the Commission's minimum distance

³ The geographic coordinates for Channel 282A at Sibley are North Latitude 43°23'54" and West Longitude 95°47'49".

separation requirements to all known existing, authorized and proposed stations and allotments.

Figure 4, attached, is a map showing the area to locate channel 282A at Sibley in compliance with the Commission's minimum distance separation requirements and city coverage requirements based on maximum Class A facilities (ERP 6 kW/HAAT 100 m). The Sibley city limits shown on Figure 4 were obtained from a map contained in the 1990 U.S. Census of Population.

Gain and Loss Areas and Available Aural Services

Figure 5A, attached, is a map showing the FM 1 mV/m primary service contours for the authorized KAJQ operation on channel 262A at Sibley and the proposed operation on channel 261C3 at Brandon. Maximum facilities and uniform terrain were used to determine contour locations. The 1 mV/m "gain" and "loss" areas are also indicated. It is emphasized that the authorized KAJQ facilities are unbuilt and the FCC has stated that the removal of an unbuilt station from a community does not represent the same concerns with loss of service that removal of an operating station would represent.⁴

Figure 5B, attached, is a map showing the FM 1 mV/m primary service contours for the authorized KAJQ

⁴ See paragraph 2 of the Report and Order in MM Docket No. 92-175 (DA 93-1374; adopted November 10, 1993, released December 13, 1993).

operation on channel 262A at Sibley, the proposed operation on channel 261C3 at Brandon and the "available" channel 282A allotment at Sibley. Maximum facilities and uniform terrain were used to determine contour locations. The resulting 1 mV/m gain and loss areas are also indicated.

All population affected by this change in community proposal (i.e. gain and loss areas) will remain well served with at least five reception services available. Figure 6 tabulates the FM stations considered for the available reception services analysis. Only those FM stations necessary to provide at least five (5) full-time aural services to the affected areas have been tabulated on Figure 6.

Figure 7 is a tabulation of the land areas and estimated populations within the 1 mV/m FM primary service contours for the authorized KAJQ channel 262A operation at Sibley, proposed channel 261C3 operation at Brandon and the "available" channel 282A allotment at Sibley. Also tabulated are the gain area, loss area and "net" gain area based on the available channel 282A allotment at Sibley (1) not considered and (2) considered. Adoption of the Petitioner's proposal, without consideration given to the available channel 282A allotment at Sibley, will increase the number of persons within the KAJQ 1 mV/m contour from 23,527 persons to 151,891 persons, and there will be a "net" increase in 1 mV/m coverage 128,364 persons.

Adoption of the Petitioner's proposal, with consideration given to the available channel 282A allotment at Sibley, will increase the number of persons within a 1 mV/m contour from 23,527 to 156,090, and will result in a "net" increase in 1 mV/m coverage of 150,615 persons.

Coverage Contours

The FM predicted coverage contours were calculated in accordance with the provisions of Section 73.313, except that uniform terrain was presumed in all directions.

Population and Area

The population within each FM primary service contour (1 mV/m), gain and loss area, and reception area was calculated using a computer program that utilizes the 1990 U.S. Census database of "population centroids". The program adds the populations of those U.S. Census designated areas whose centroid was within each service area. The area within each FM primary service contour was calculated using a root mean square algorithm.

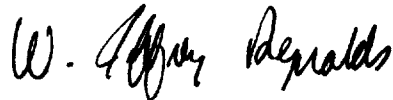
Conclusion

Channel 261C3 can be substituted for channel 262A at Sibley, Iowa and reallocated from Sibley, Iowa to Brandon, South Dakota in compliance with all applicable

Sibley, Iowa and Brandon, South Dakota

Commission Rules. Furthermore, adoption of the proposal, without consideration given to the available channel 282A allotment at Sibley, will increase the number of persons within the KAJQ 1 mV/m contour from 23,527 persons to 151,891 persons, and there will be a "net" increase in 1 mV/m coverage of 128,364 persons. Adoption of the Petitioner's proposal, with consideration given to the available channel 282A allotment at Sibley, will increase the number of persons within a 1 mV/m contour from 23,527 persons to 156,090, and will result in a "net" increase in 1 mV/m coverage of 150,615 persons.

Therefore, Petitioner requests the substitution of channel 261C3 for channel 262A at Sibley, Iowa and the reallocation of channel 261C3 from Sibley to Brandon, South Dakota and the modification of the construction permit (BPH-930809MA) of FM Station KAJQ.



W. Jeffrey Reynolds

du Treil, Lundin & Rackley, Inc.
240 North Washington Blvd.
Suite 700
Sarasota, Florida 34236

July 10, 1995

TECHNICAL EXHIBIT
IN SUPPORT OF
A PETITION FOR RULE MAKING
TO AMEND THE FM TABLE OF ALLOTMENTS
SIBLEY, IOWA AND BRANDON, SOUTH DAKOTA

FM SEPARATION STUDY

Job Title : Proposed KAJQ, Brandon, South Dakota Separation Buffer 32 km
FCC DB Date : 05/17/95
Channel 261C3 (100.1 MHz) Coordinates : 43-36-02 96-31-15

Call Status	City State	FCC File No.	Channel Freq.	ERP(kW) HAAT(m)	Latitude Longitude	Bearing deg-Tru	Dist. (km)	Req. (km)
KRSW LIC	Worthington MN	BLED941220KA	207C1 89.3	100. 169.0	43-53-01 95-55-44	56.3	57.13 33.13	24 CLEAR
KKMA LIC	Le Mars IA	BLH781206AE	258C1 99.5	100. 241.0	42-28-56 96-15-30	170.2	126.08 50.08	76 CLEAR
KKCK LIC	Marshall MN	BLH890627KB	259C1 99.7	100. 282.0	44-16-56 96-19-05	12.0	77.48 1.48	76 CLOSE
KEMB LIC	Emmetsburg IA	BLH930907KC	261A 100.1	5. 82.0	43-01-26 94-41-56	112.9 SS	161.11 19.11	142 CLEAR
From Channel 252A per D92-75								
KOLV CP	Olivia MN	BPH940927ID	261C3 100.1	10. 83.0	44-45-49 94-55-49	43.9	181.33 28.33	153 CLEAR
From Channel 269A per One-Step Process								
KAJQ CP	Sibley IA	BPH930809MA	262A 100.3	6. 72.0	43-17-58 95-43-21	117.2	72.78 -16.22	89 SHORT ¹
KIKN LIC	Salem SD	BLH931019KD	263C1 100.5	100. 287.0	43-29-18 97-26-34	260.8	75.56 -0.44	76 CLOSE ²

** End of separation study for channel 261C3 **

¹ Authorized KAJQ site. Requested reallotment of channel 261C3 to Brandon, South Dakota is mutually exclusive with the Petitioner's current channel 262A allotment at Sibley, Iowa.

² Complies with the minimum distance separation requirements of Section 73.207 when rounded to the nearest whole kilometer pursuant to Section 73.208.

Figure 2

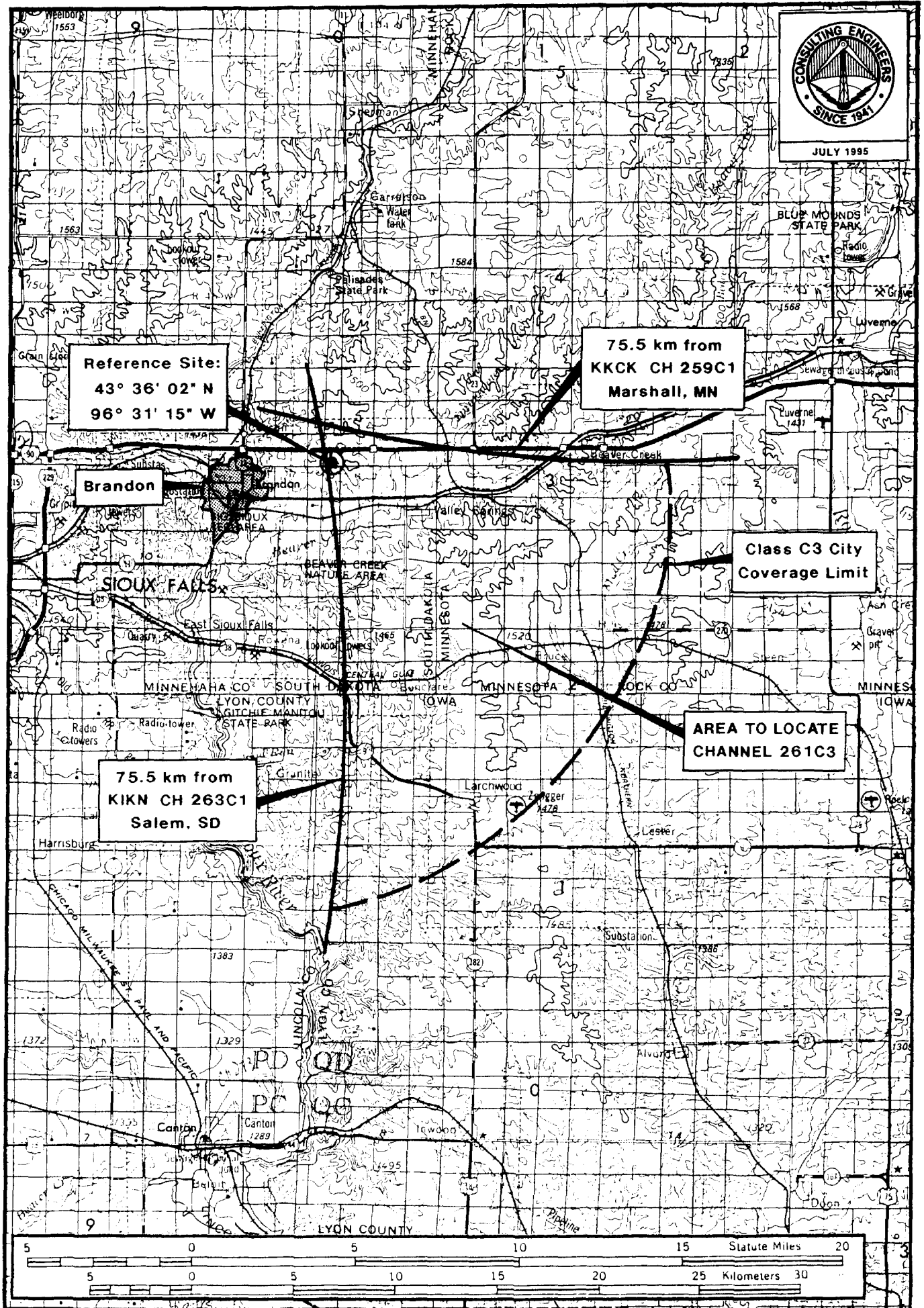


Figure 3

TECHNICAL EXHIBIT
IN SUPPORT OF
A PETITION FOR RULE MAKING
TO AMEND THE FM TABLE OF ALLOTMENTS
SIBLEY, IOWA AND BRANDON, SOUTH DAKOTA

FM SEPARATION STUDY

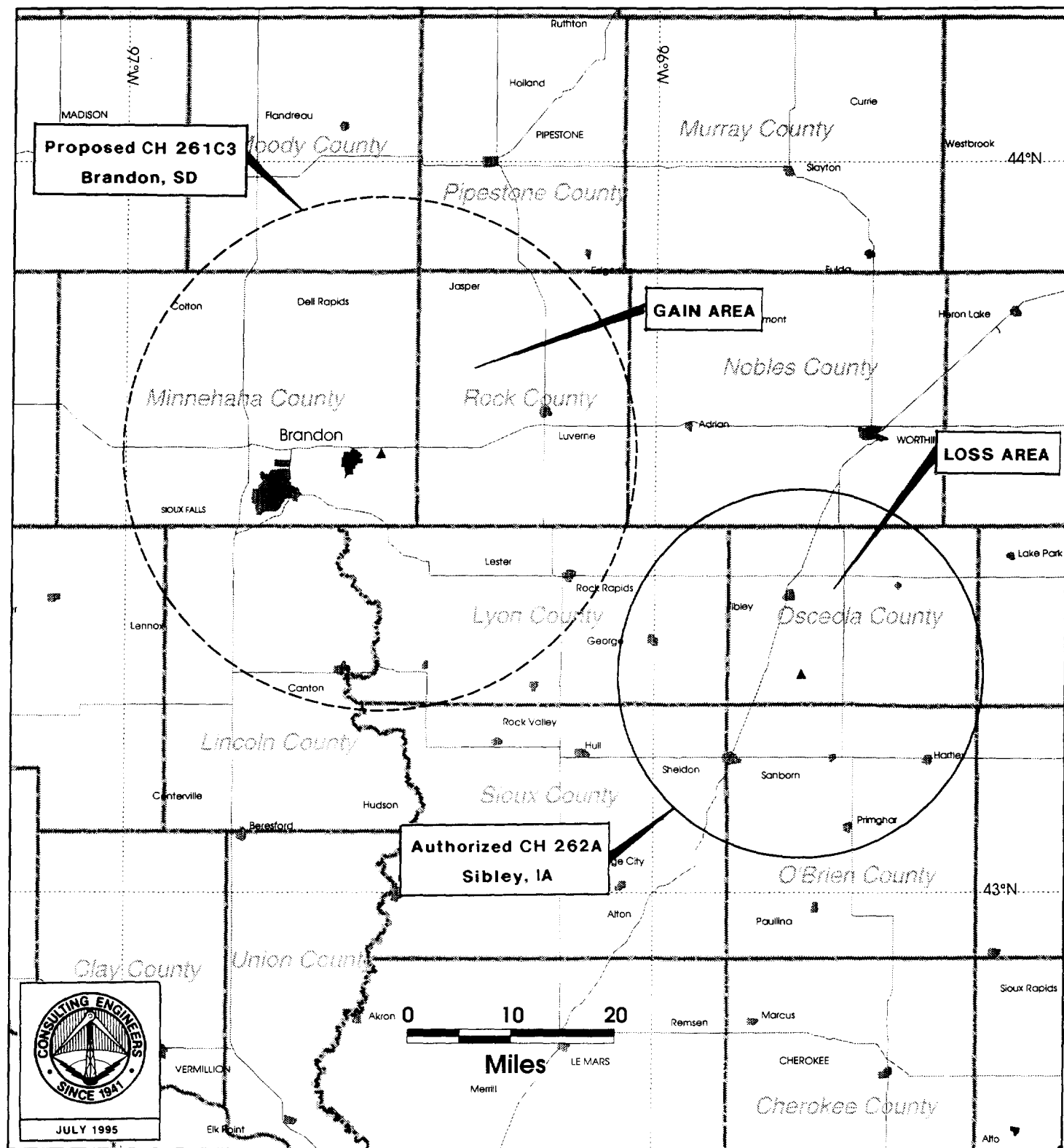
Job Title :Available Ch. 282A, Sibley, Iowa Separation Buffer 32 km
FCC DB Date : 05/17/95
Channel 282A (104.3 MHz) Coordinates : 43-23-54 95-47-49

Call Status	City State	Channel FCC File No.	ERP(kW) HAAT(m)	Latitude Longitude	Bearing deg-Tru	Dist. (km)	Req. (km)
KITN	Worthington	228C2	50.	43-31-31	65.4	34.13	15
CPM	MN	BMPH940304IC	93.5	142.0	95-24-47	19.13	CLEAR
One-Step Application-From Channel 228A							
KRRO	Sioux Falls	279C2	50.0	43-29-20	277.7	78.71	55
LIC	SD	BLH901010KD	103.7	57.0	96-45-40	23.71	CLEAR
FROM CHANNEL 228A per D88-165							
KUOO	Spirit Lake	280C2	50.0	43-24-20	89.0	57.80	55
LIC	IA	BLH900927KA	103.9	150.0	95-05-01	2.80	CLOSE
WNAXFM	Yankton	281C1	100.	42-38-24	230.9	132.78	133
LIC	SD	BLH891026KA	104.1	299.0	97-03-21	-0.22	CLOSE ¹
KPHR	Milbank	282C1	100.	45-10-31	334.8	219.13	200
LIC	SD	BLH910204KC	104.3	299.0	96-59-15	19.13	CLEAR
KJLY	Blue Earth	283C2	50.0	43-39-41	77.3	139.63	106
LIC	MN	BLH901015KE	104.5	138.0	94-06-29	33.63	CLEAR
KKLSFM	Sioux Falls	284C1	100.	43-43-46	290.0	110.47	75
LIC	SD	BLH880601KB	104.7	215.0	97-05-10	35.47	CLEAR
	Spencer	285C3		43-17-45	102.6	51.71	42
ALC	IA	Docket94-82	104.9	.0	95-10-30	9.71	CLOSE
Site Restricted 17Km (10.5mi) North-Effective 05-12-95-Reserved for KIGL per D94-82							

** End of separation study for channel 282A **

¹ Complies with the minimum distance separation requirements of Section 73.207 when rounded to the nearest whole kilometer pursuant to Section 73.208.

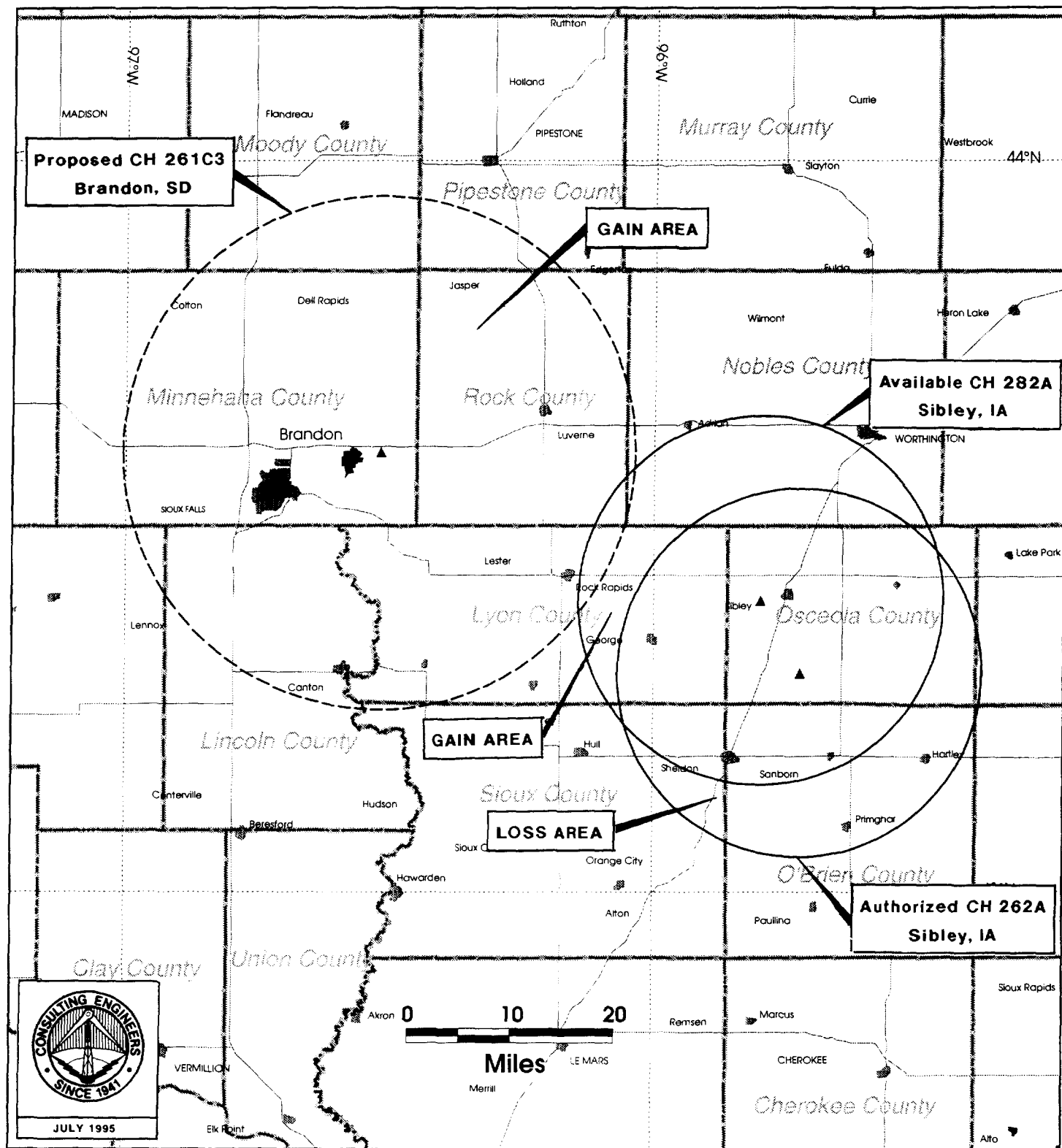
Figure 5A



1 mV/m PRIMARY SERVICE CONTOURS

du Treil, Lundin & Rackley, Inc. Sarasota, Florida

Figure 5B



1 mV/m PRIMARY SERVICE CONTOURS

du Treil, Lundin & Rackley, Inc. Sarasota, Florida